

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Selena S. Randolph,
Plaintiff,

v.

WBL SPE II, LLC, as successor to
World Business Lenders, LLC,
Defendant.

COMPLAINT SEEKING
DECLARATORY AND
INJUNCTIVE RELIEF

Civil Case No. _____

**EXHIBIT 3 – Mortgage Servicer’s Worksheet filed in the Bankruptcy
Court 4/13/18**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE**

In Re:) Chapter 13
Selena S. Randolph,)
Debtor)
No. 17-10121-BAH

WBL SPE II, LLC, as successor to
World Business Lenders, LLC,

Movant,

v.

Selena S. Randolph,

Respondent.

**WORKSHEET COMPLETED BY THE MORTGAGEE/SERVICER IN SUPPORT OF MOTION
FOR RELIEF FROM STAY INVOLVING RESIDENTIAL REAL PROPERTY**

I, Shannon Flood, Vice President, Asset Resolution for WBL SPE II, LLC, do hereby declare:

BACKGROUND INFORMATION

1.	Address or general description of the real property that is the subject of this motion	16 Front Street, Rochester, New Hampshire 03868
2.	Name and address of original mortgagee	World Business Lenders, LLC, 120 W. 45 th Street, New York, NY 10036
3.	Dates of the note and mortgage	January 3, 2014
4.	If movant is different from the original mortgagee, the status of movant (e.g., holder, assignee, or servicing agent)	Successor to World Business Lenders, LLC
5.	Current address of movant	101 Hudson Street, Floor 33, Jersey City, NH 07302
6.	Postpetition payment address of movant if different from address in paragraph 5 above	See #5
7.	Brief statement of movant's standing (e.g., first mortgagee, second mortgagee, assignee, servicing agent)	Second mortgage holder (fully secured)

DEBT/VALUE REPRESENTATIONS

8.	Total indebtedness of debtor to movant at the time of filing the motion. This amount may not be relied upon as a "payoff" quotation.	\$67,014.56 (as of 4/4/18)
9.	Movant's estimated market value of the real property	\$222,900.00
10.	Source of estimated valuation	Current City of Rochester tax assessed value

LBF 4001-1A (Eff. 11/1/16)

**STATUS OF DEBT AS OF THE PETITION DATE (CH. 13) OR
MOTION FOR RELIEF FILING DATE (CH. 7)**

11.	Total prepetition indebtedness of debtor to movant as of petition filing date (ch. 13) OR total contractual debt owed (ch. 7)	\$50,017.81	A
A.	Amount of principal	\$ 8,048.93	
B.	Amount of interest	\$29,198.68	
C.	Amount of escrow (taxes and insurance)	\$0	
D.	Amount of forced placed insurance	\$0	
E.	Amount of attorney's fees incurred prepetition that have been or will be charged to the debtor	\$8,399.50 as of 01/30/2017	
F.	Amount of prepetition late fees, if any, billed to debtor	\$805.00 (NSF Fees)	
G.	Itemize any additional prepetition fees or costs charged to the debtor's account and not listed above, including inspection fees, valuation fees, real estate taxes, etc. A separate exhibit may be attached to this worksheet. If so, it is marked Exhibit _____.	A. \$ 1,805.56 (Legal Costs Incurred) B. \$ 1,760.14 (Prepayment premium) C. \$ D. \$	
12.	Number of payments in arrears on the petition date	N/A – Past Maturity	
13.	Total amount of prepetition arrearage	\$50,017.81	
14.	Contractual interest rate. If interest rate is (or was) adjustable, please list the rate(s) and date(s) the rate(s) was/were in effect. A separate exhibit may be attached to this worksheet. If so, it is marked Exhibit _____.	Fixed 125%	

STATUS OF DEFAULT AS OF APRIL 4, 2018

15.	Amount of monthly payment (including principal, interest, and escrow)	N/A – Past Maturity
16.	Date last payment was received March 10, 2014	
17.	Alleged number of postpetition or contractual payments due postpetition from filing of petition through payment due on _____	N/A – Past Maturity
18.	Number of payments in arrears as of above date	N/A – Past Maturity
19.	Please list below all contractual payments due and all payments made since date of filing:	N/A – Past Maturity

Payments Due Since Date of Filing	
Date Due	Amount Due
Past Maturity – Payment Due in Full	

Payments Made Since Date of Filing	
Date Received	Amount Paid
None	

20.	Amount of movant's attorney's fees charged or to be charged to the debtor for the preparation, filing, and prosecution of this motion	\$1,000.00	
21.	Amount of filing fee for this motion	\$181.00	
22.	Itemize amount and date of charge for any additional postpetition or contractual fees or costs charged or to be charged to the debtor's account and not listed above, including inspection fees, valuation fees, insurance, real estate taxes, attorney's fees, etc. A separate exhibit may be attached to this worksheet. If so, it is marked Exhibit ____.	Amount	Date
		A. \$4,002.50 B. \$ 15.50 C. \$ 11,797.75	A. Post petition attorneys' fees incurred through 4/4/18 B. Post petition legal costs incurred through 4/4/18 C. Post petition interest through 4/4/18
23.	Sum held in suspense by movant in connection with this contract, if applicable	None	
24.	Total amount of postpetition or contractual arrearage	\$67,014.56 (as of 4/4/18)	

REQUIRED ATTACHMENTS

The following documents are attached to this worksheet in support of the motion and marked as exhibits:

- (1) Copies of documents showing movant's interest in the subject property (e.g., a complete and legible copy of the promissory note or other debt instrument together with a complete and legible copy of the mortgage and any assignment in the chain from the original mortgagee to the movant), which are marked as Exhibit A (Mortgage), Exhibit B (Note) and Exhibit C (Guaranty).
- (2) Copies of documents showing proof of standing to bring this motion for relief if different than the above, which are marked as Exhibits _____.